

I support the removal of the Morse Code Element 1 Test for the following reasons, to-wit:

1. Morse code is not used in the Commercial Communication Circuits in the United States of America in such diverse areas as Maritime Communication, Overland Communication Circuits and Military Uses. As such, the vocational opportunities to further the Radio Art are limited and the opportunities to apply such skills are limited.
 2. Morse Code Testing was reduced to 5 WPM to comply with the then existing International Radio Regulations in the Year 2000. This move was done to eliminate the burden on issuing licenses for different classes, the simplification of rules in the public interest, convenience and necessity of the Commission. Since 5 WPM was adopted to meet compliance standards with International Radio Regulations and such requirements have been relaxed at the WRC-00 to allow the deletion of the Morse Code Requirement, it only makes sense to eliminate Morse Code Testing to eliminate the burden upon the Commission and its Volunteer Examiners to carry out a regulation which is no longer in effect.
 3. Further more, allowing Amateur License Holders to access the Frequencies below 30 MHZ would help to increase the interest in those areas of the Radio Arts where people interested in the Amateur Service and its many different facets could enter the service and contribute without having to endure a Morse code exam. Elimination for the code would make the Amateur Radio Service more attractive for those persons whose radio interests lie outside of Morse code or CW Mode. Amateur Radio HF plays a big role in remote locations and in Emergency Response such as Western Wildfire Response, Hurricane and Weather Incidents as well as other Emergency Response Areas. By elimination of the Morse code Requirement, the spread of HF Amateur Radio into Emergency Response Units could be facilitated since licensure would be only a written test; this alone justifies the elimination of the code Requirement since in the Interest of Homeland Security, the further proliferation of HF Qualified Radio Operators is in the Public Interest, convenience and necessity as a tool of Public Safety as evidenced by the Public Service aspect of Amateur Radio under ARES (Amateur Radio Emergency Service-operated under the ARRL) and the RACES (Radio Amateur Civil Emergency Service-operated under the auspices of The Department of Homeland Security) as moreover contained under Part 97 of the Commission's Rules.
- To oppose the requirement that the Code be dropped from the list of elements is to hinder the work of the Commission and its Volunteers and is not in the best interest of the public whom the Commission serves since the resources required to carry out this mandate are limited and could be put to better use by the Commission and its Volunteer Examiners in carrying out their mission to serve the Public.

Respectfully submitted,

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